

# Exhibit 6

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

AMBER WOOD, *et. al*, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

FCA US LLC,

Defendant.

Case No. 5:20-cv-11054-JEL-APP

District Judge Judith E. Levy

Magistrate Judge Anthony P. Patti

**JOINT DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES, EXPENSES, AND SERVICE AWARDS**

We, Matthew D. Schelkopf and Daniel O. Herrera, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. Matthew D. Schelkopf is a partner at Sauder Schelkopf LLC ("Sauder Schelkopf") in Berwyn, Pennsylvania, attorney of record for Plaintiffs, and a member of the Plaintiffs' Steering Committee. Mr. Schelkopf submits this certification based upon personal knowledge, in support of Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards and if called to do so, could testify to the matters contained herein.

2. Daniel O. Herrera is a partner at Cafferty Clobes Meriwether & Sprengel LLP ("Cafferty Clobes") in Chicago, Illinois, attorney of record for Plaintiffs. Mr.

Herrera submits this certification based upon personal knowledge, in support of Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards and if called to do so, could testify to the matters contained herein.

**SAUDER SCHELKOPF LLC**

3. Sauder Schelkopf is a four-attorney firm located in Berwyn, Pennsylvania representing plaintiffs in consumer fraud class actions, product liability, and other complex class action litigation in Pennsylvania, New Jersey, and across the United States. Sauder Schelkopf was named to the 2023 edition of *U.S. News – Best Lawyers®* “Best Law Firms” which recognizes “the most elite firms across the nation, identified for their professional excellence with consistently positive feedback from clients and peers.”

4. In 2022, LawDragon recognized Mr. Schelkopf in its list of 500 Leading Plaintiff Consumer Lawyers. The Legal Intelligencer named him to its 2020 Pennsylvania Trailblazers list recognizing 31 lawyers who “have taken extra measures to contribute to positive outcomes . . . and who are truly agents of change.” Since 2010, Mr. Schelkopf has been selected by Pennsylvania Super Lawyers as a Rising Star (a distinction held by the top 2.5% of attorneys in PA) and then a Pennsylvania Super Lawyer, as chosen by their peers and through the independent research of Law & Politics. In 2012, The American Lawyer Media, publisher of The Legal Intelligencer and the Pennsylvania Law Weekly, named Mr. Schelkopf as one of the

“Lawyers on the Fast Track” a distinction that recognized thirty-five Pennsylvania attorneys under the age of 40 who show outstanding promise in the legal profession and make a significant commitment to their community. Mr. Schelkopf was also selected as a Top 40 under 40 by the National Trial Lawyers in 2012-2015. In 2020, Mr. Schelkopf was selected to America’s Top 100 High Stakes Litigators® in Pennsylvania, comprised of the nation’s most exceptional trial lawyers for high stakes legal matters. In 2021, Mr. Schelkopf was selected as a Top 25 Products Liability Trial Lawyer and then as a Best Lawyer® in America (Mass Tort/Class Action) in 2022.

5. Mr. Schelkopf has an extensive background in litigation on behalf of consumers, and he is currently serving as lead or co-lead counsel in many class actions in federal courts across the country, including automotive defect cases similar to this one.

6. Mr. Schelkopf has been restoring, building and racing automobiles since he was 15 years old. Prior to attending law school, he worked in two automotive shops performing everything from routine maintenance to full automotive restorations. These opportunities have provided him with first-hand experience and expertise with automotive drivetrains and electrical systems. He continues to restore and maintain his own automobiles while three of his most recent auto restorations have been featured in nationally circulated automotive publications.

7. Mr. Schelkopf has extensive experience prosecuting consumer class action cases against automobile manufacturers, including:

- Appointed as Class Counsel by Judge Madeline Cox Arleo in *Zhao v. Volkswagen Group of Am., Inc.*, No. 2:21-cv-11251-MCA-LDW (D.N.J.) on behalf of owners and lessees of approximately two million Volkswagen and Audi vehicles that experienced premature water pump failures. Final approval was granted to a nationwide class action settlement on April 19, 2022.
- Appointed as Class Counsel by Judge Josephine L. Staton in *In re: Hyundai and Kia Engine Litig.*, No. 8:17-cv-00838-JLS-JDE 02223 (C.D. Cal.) on behalf of owners and lessees of approximately 4 million Hyundai and Kia vehicles that experienced catastrophic engine failure. Final approval was granted to a nationwide class action settlement valued at \$892 million on May 10, 2021.
- Appointed as Class Counsel by Judge Susan D. Wigenton in *Brown v. Hyundai Motor Am.*, No. 2:18-cv-11249-SDW-JAD (D.N.J.) on behalf of owners and lessees of approximately 1 million Hyundai vehicles related to a defect that caused premature engine failure. Judge Wigenton granted final approval to the proposed class action settlement on April 20, 2021.
- Appointed as Class Counsel by Judge Nancy E. Brasel in *Fath v. American Honda Motor Co., Inc.*, No. 18-cv-1549 (D. Minn.) on behalf of owners and lessees of approximately 800,000 Honda vehicles that experienced oil dilution. Final approval was granted to a nationwide class action settlement on September 11, 2020.
- Appointed as Class Counsel by Judge Joseph H. Rodriguez in *Salcedo v. Subaru of America, Inc.*, 1:17-cv-08173 (D.N.J.) on behalf of owners and lessees of MY 2012-2017 Subaru WRX and WRX STi vehicles with alleged connecting rod bearing defect that resulted in engine failure. Final approval was granted to a nationwide class action settlement on June 5, 2019.
- Appointed as Class Counsel by Judge Madeline Cox Arleo in *Bang v. BMW of North America, LLC*, No. 2:15-cv-6945 (D.N.J.) in a case involving certain BMW vehicles containing a defect resulting in excessive oil consumption. Final approval was granted to a nationwide class action settlement on September 11, 2018.

- Appointed as Class Counsel by Judge Jerome B. Simandle in *Yaeger v. Subaru of America, Inc.*, No. 1:14-cv-4490-JBS-KMW in a case involving certain Subaru vehicles with an alleged defect that caused excessive engine oil consumption. Final approval was granted to a nationwide class action settlement on August 31, 2016.
- Appointed Class Counsel in *Davitt v. Honda North America, Inc.*, No. 2:13-cv-00381-MCA-JBC (D.N.J.), a class action lawsuit on behalf of current and former owners and lessees of certain Honda CR-V vehicles containing alleged defective door lock actuators. Honorable Madeline Arleo granted final approval of the settlement on May 8, 2015.
- Appointed Class Counsel in *Henderson v. Volvo Cars of North America, LLC*, No. 2:09-cv-04146-CCC-JAD (D.N.J), a class action lawsuit on behalf of current and former owners and lessees of Volvo vehicles related to an alleged transmission defect in model years (“MY”) 2003-2005 XC90 Turbo 6-cylinder SUVs. Final approval was granted to a settlement that conferred a substantial benefit on over 90,000 class members.
- Appointed as Interim Co-Lead Interim Class Counsel by Judge George Caram Steeh in *Tolmasoff v. General Motors, LLC*, No.: 2:16-cv-11747 (E.D. Mich.) in a case involving a claim of overstated miles-per-gallon in GM vehicles.
- Appointed as Co-Class Counsel in *Mendoza v. Hyundai Motor Co.*, No. 5:15-cv-01685 (N.D. Cal.) related to premature engine failure in certain Hyundai vehicles. Judge Freeman granted final approval to the settlement on January 31, 2017.
- Appointed as Co-Class Counsel in *Whalen v. Ford Motor Company*, No. 3:13-cv-03072-EMC (N.D. Cal.), a class action lawsuit on behalf of owners and lessees of Ford and Lincoln vehicles related to an alleged design defect in which the Sync®, MyFordTouch® and MyLincolnTouch® systems fail to operate as designed.
- Appointed as Co-Lead Counsel in *Lyman v. Ford Motor Co.*, No. 21-cv-10024 (E.D. Mich.), a class action lawsuit on behalf of owners and lessees of Ford vehicles related to an alleged defect that causes excessive engine oil consumption.

8. Sauder Schelkopf has staffed projects necessary to the successful outcome of this matter with attorneys and staff according to their skills and expertise, and sought to avoid duplication and other efficiencies in prosecuting the case. All work reflected in the lodestar was performed for the benefit of the class.

9. To date, in performing work on this case, Sauder Schelkopf's attorneys and staff expended 263.1 hours for a total lodestar of \$161,355.00. The firm's attorneys and staff kept detailed contemporaneous records of the time they spent on this litigation. In auditing time, Sauder Schelkopf exercised billing judgment to eliminate any inefficiency or duplication.

10. Below is a chart showing the professionals who worked on this matter for Sauder Schelkopf, their positions at the firm (e.g., Partner, Associate, Law Clerk), the total number of hours they worked, their hourly billing rates, and the resulting lodestar. These figures reflect efficient staffing and work that the firm reasonably performed for the benefit of the class.

<b>Name</b>	<b>Title</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Joseph Sauder	Partner	34.6	\$750	\$25,950.00
Matthew Schelkopf	Partner	141.70	\$700	\$99,190.00
Joseph Kenney	Partner	24	\$475	\$11,400.00
Lori Kier	Of Counsel	42.1	\$500	\$21,050.00
Sonjay Singh	Associate	4.40	\$300	\$1,320.00
Andrew Chung	Law Clerk	16.30	\$150	\$2,445.00
<b>TOTALS</b>		<b>263.1</b>		<b>\$161,355.00</b>

11. Sauder Schelkopf's rates have been previously approved by multiple courts:

- *Zhao v. Volkswagen Group of Am., Inc.*, No. 2:21-cv-11251-MCA-JRA, ECF No. 60 (D.N.J. Oct. 19, 2022);
- *Brown v. Hyundai Motor Am.*, No. 2:18-cv-11249-SDW-JAD, ECF No. 69 (D.N.J. Apr. 19, 2021);
- *Fath v. American Honda Motor Co., Inc.*, No. 18-cv-1549-NEB-LIB, ECF No. 148 (D. Neb. Sept. 11, 2020);
- *Salcedo v. Subaru of Am., Inc.*, No. 1:17-cv-08173-JHR-AMD, ECF No. 47 (D.N.J. June 5, 2019);
- *Bang v. BMW of N. Am., LLC*, No. 2:15-cv-6945-MCA-SCM, ECF No. 121 (D.N.J. Sept. 11, 2018);
- *Yaeger v. Subaru of Am., Inc.*, No. 1:14-cv-4490-JBS-KMW, ECF No. 110 (D.N.J. Aug. 31, 2016); and



- *Davitt v. Honda North America, Inc.*, No. 2:13-cv-00381-MCA-JBC, ECF No. 70 (D.N.J. May 8, 2015).

12. Sauder Schelkopf advanced a variety of out-of-pocket expenses in furtherance of the prosecution of this litigation. These expenses are reflected in the firm's books and records that are regularly maintained in the ordinary course of the firm's business. These books and records are prepared using invoices, receipts, check records, and other source materials and are an accurate record of the expenses incurred. Third-party expenses are not marked up, meaning that the firm requests reimbursement only for the amount actually billed by the third party. Specifically, Sauder Schelkopf incurred \$1,100.00 in advertising expenses.

**CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP**

13. Cafferty Clobes is a leading, national class action firm with offices in Chicago, Illinois, Media, Pennsylvania, and Ann Arbor, Michigan, and decades of experience leading and handling complex consumer, antitrust, commodities, securities, employment and other commercial class actions both in Illinois and across the country. In my time at Cafferty Clobes, I have helped lead the firm's efforts in cases that have produced hundreds of millions of dollars in relief for affected consumers. *See e.g., In re Disposable Contact Lens Antitrust Litig.*, MDL No. 2626 (M.D. Fla.) (Cafferty Clobes serves on Defendant Discovery Committee in action in that generated over \$100 million in settlements); *In re Behr DeckOver Marketing, Sales Practices, and Products Liability Litig.*, No. 17-cv-4464 (N.D. Ill.) (uncapped

settlement entitling class members to 75% of all documented repair costs); *Sharp v. Watts Regulator Co.*, No. 8:16CV200, 2017 WL 1373860, at \*3 (D. Neb. Apr. 13, 2017) (\$14 million settlement); *Klug v. Watts Regulator Co.*, No. 8:15CV61, 2017 WL 1373857, at \*3 (D. Neb. Apr. 13, 2017) (\$4 million settlement); *In re Autoparts Antitrust Litig.*, MDL No. 2311 (E.D. Mich.) (representing Cafferty Clobes on Plaintiffs' Discovery Committee in multidistrict litigation that has secured more than \$1.2 billion in settlements for affected vehicle owners); *Traxler v. PPG Indus., Inc.*, No. 15-cv-00912 (N.D. Ohio) (\$6.5 million settlement in deck resurfacer class action); *In re TikTok, Inc. Consumer Privacy Litig.*, MDL No. 2948 (N.D. Ill.) (Mr. Herrera and Cafferty Clobes were responsible for drafting pleadings and discovery in an action that generated \$92 million settlement); *Carroll v. Crème de la Crème, Inc.*, No. 17-CH-1624 (Cook County Cir. Ct.) (Cafferty Clobes appointed Co-Lead Counsel and obtained a settlement providing significant relief, including requiring the defendant to change its biometric collection and storage practices); *In re Experian Data Breach Litig.*, No. 8:15-cv-01592-AG-DFM, (C.D. Cal.) (\$22 million class settlement—valued at more than \$170 million when factoring non-monetary relief—arising out of a breach of consumers' personally identifiable information); *In re Premiera Blue Cross Customer Data Security Breach Litig.*, 3:15-md-2633-SI (D. Or.) (\$32 million data breach settlement—total value in excess of \$148 million).

14. I and Cafferty Clobes also continue to represent consumers as lead counsel in class cases throughout the country, including automotive class actions. *See, e.g., In re Cattle and Beef Antitrust Litig.*, MDL No. 3031 (D. Minn.) (Mr. Herrera serves on the Cafferty Clobes team appointed lead counsel for the cattle seller class); *In re General Motors Air Conditioning Marketing and Sales Practices Litig.*, No. 4:17-cv-12786-MFL-EAS (Mr. Herrera serves on the Cafferty Clobes team serving as co-lead counsel in MDL arising from defect in 3.7 million vehicles); *Rudolph v. United Airlines, Inc.*, No. 1:20-cv-2142, ECF No. 27 (N.D. Ill. June 16, 2020) (appointing Mr. Herrera and Cafferty Clobes co-lead counsel in action seeking refunds for flight cancellations).

15. Like our co-counsel, Cafferty Clobes has staffed projects necessary to the successful outcome of this matter with attorneys and staff according to their skills and expertise, and sought to avoid duplication and other efficiencies in prosecuting the case. All work reflected in the lodestar was performed for the benefit of the class

16. To date, in performing work on this case, Cafferty Clobes' attorneys and staff expended 41.4 hours for a total lodestar of \$30,165.00. The firm's attorneys and staff kept detailed contemporaneous records of the time they spent on this litigation. In auditing time, Cafferty Clobes exercised billing judgment to eliminate any inefficiency or duplication.

17. Below is a chart showing the professionals who worked on this matter for Cafferty Clobes, their positions at the firm (e.g., Partner, Associate, Paralegal, Law Clerk), the total number of hours they worked, their hourly billing rates, and the resulting lodestar. These figures reflect efficient staffing and work that the firm reasonably performed for the benefit of the class.

<b>Name</b>	<b>Title</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Patrick E. Cafferty	Partner	2.4	\$1,050	\$2,520.00
Bryan L. Clobes	Partner	4.1	\$1,000	\$4,100.00
Jennifer W. Sprengel	Partner	0.7	\$1,000	\$700.00
Anthony F. Fata	Partner	2.4	\$950	\$2,280.00
Daniel O. Herrera	Partner	16.5	\$800	\$13,440.00
Kaitlin Naughton	Associate	9.4	\$500	\$4,700.00
John Schefflow	Associate	1.8	\$550	\$990.00
Sharon M. Nyland	Law Clerk	4.1	\$350	\$1,435.00
<b>TOTALS</b>		<b>41.4</b>		<b>\$30,165.00</b>

18. I have general familiarity with the range of hourly rates typically charged by plaintiffs' class action counsel in the geographical area where my firm practices and throughout the United States, both on a current basis and historically. From that basis, I am able to conclude that the rates charged by my firm are within

the range of market rates charged by attorneys and professional staff of equivalent experience, skill and expertise for legal services furnished in complex contingency class action litigation such as this.

19. The hourly rates of the professionals in my firm, including my own, reflect experience and accomplishments in the area of class litigation. The rates charged by Cafferty Clobes are commensurate with hourly rates charged by peer firms that practice in the area of class litigation, and courts have approved my firm's rates. *See, e.g., In re TikTok Consumer Privacy Litig.*, No. 20-cv-4699 (N.D. Ill.), ECF No. 261, pp. 71-72; *Bishop v. Behr Process Corp.*, No. 17-cv-4464 (N.D. Ill.), ECF No. 118, ¶¶ 21-27.

20. My firm expended a significant amount of time litigating this case and securing the Settlement for the Class. I took meaningful steps to ensure the efficiency of our work and to avoid duplication of efforts.

21. The time described above does not include charges for expense items. Expense items are billed separately, and such charges are not duplicated in my firm's billing rates. Based upon my firm's records, Cafferty Clobes incurred \$550.87 in expenses. These costs were necessary to the investigation, prosecution, and settlement of this Action. A breakdown of my firm's costs and expenses, which I assert are reasonable and were entirely self-funded, are set forth below.

<b>Description</b>	<b>Totals Per Category</b>
Filing Fee	\$400.00
Service of Process	136.00
Copies & Printing	\$5.25
Computer Research	\$9.62
<b>Total:</b>	<b>\$550.87</b>

22. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred.

We declare under penalty of perjury that the foregoing is trusted and correct.

Executed on November 16, 2022.

By: /s/ Matthew D. Schelkopf  
Matthew D. Schelkopf

By: /s/ Daniel O. Herrera  
Daniel O. Herrera